## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

## Alexandria Division

UNITED STATES OF AMERICA :

Criminal No. 21-CR-245 (AJT)

V.

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IGOR Y. DANCHENKO,

:

Defendant.

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## THE UNITED STATES' MOTION TO SET PROPOSED CLASSIFIED DISCOVERY AND CIPA SCHEDULE

The United States of America, by and through its attorney, Special Counsel John H. Durham, respectfully moves this Honorable Court, pursuant to the Classified Information Procedures Act ("CIPA"), 18 U.S.C. App. III §§ 1-16, to consider the proposed schedule set forth below for classified discovery deadlines, filing deadlines, notices, and hearings pertaining to the use and admissibility of classified information at trial in this matter.

For the Court's consideration, the parties have proposed the following pretrial deadlines:

Deadline to produce classified discovery: March 29, 2022

Government's Section 4 filing: April 27, 2022

Ex parte Section 4 hearing: May 3, 2022

Defendant's Section 5(a) written notice: May 27, 2022

Government's response to defendant's Section 5(a): June 24, 2022

Defendant's reply: July 8, 2022

Respectfully submitted,

JOHN H. DURHAM Special Counsel

By:

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Dated: December 23, 2021